DINA MINOR 1208 Lakeside Avenue Baltimore, MD 21218 IN THE

CIRCUIT COURT

Plaintiff

FOR

-V8-

BALTIMORE CITY

JESSICA SAIVE 708 Park Boulevard Altoona, PA 10601

.

Defendant

COMPLAINT

Dina Minor, Plaintiff, by Alvin Sellman, her attorney, sues Jessica Saive, Defendant.

COUNT I (NEGLIGENCE)

- 1. That on May 20, 2009, the Plaintiff, Dina Minor, was operating her automobile in a northerly direction on Ellerslie Avenue at the intersection with Chestnut Hill Avenue, said streets being public highways in the City of Baltimore, State of Maryland.
- 2. That at the said same time, the Defendant, Jessica Saive, was operating an automobile owned by her in a westerly direction on Chestnut Hill Avenue at the intersection aforesaid.
- 3. That the aforesaid intersection is controlled by a stop sign for traffic traveling westbound on Chestnut Hill Avenue.
- 4. That then and there, without warning, said Defendant, failed to obey and come to a proper stop at the stop sign; entered the intersection, and collided with the vehicle being operated by the Plaintiff.
- 5. That the impact of the collision was so forcible in nature that Plaintiff's vehicle was pushed sideways, and had to be towed from the scene.
- 6. That Plaintiff had to be physically removed from her vehicle and she was taken by ambulance to Johns Hopkins Hospital emergency room where she was examined; multiple x-rays were taken; she was prescribed medications, and she was advised as to follow-up medical care.

- 7. That this collision was as a result of the negligence, carelessness, and recklessness of the Defendant, Jessica Saive, in that she falled to obey and come to a proper stop for a stop sign, entered the intersection and collided with Plaintiff's vehicle which was traveling upon a public highway; that she failed to maintain a proper look-out; that she failed to have her vehicle under proper and sufficient control; and she failed to take such other and further evasive action to avoid colliding with Plaintiff's vehicle.
- 8. That as a direct and proximate cause of the negligence of the Defendant, Jessica Saive, the Plaintiff, Dina Minor., was caused to sustain injuries to her head, neck, body, and limbs, physical pain and suffering; mental pain and suffering; anxiety; indebtedness for medical expenses; lost income, and permanent disability in conjunction with the injury which she sustained to her lumbosacral spine, and she was otherwise injured, wounded, and damaged.
- 9. That all of Plaintiff's losses, damages, injuries, past, present, and prospective, were, are, and will be due to the negligence of the Defendant, Jessica Saive, without any negligence or lack of due care on the part of the Plaintiff contributing thereto.

WHEREFORE, this suit is brought and the Plaintiff, Dina Minor, claims the sum of Seven Hundred Fifty Thousand (\$750,000.00) Dollars damages.

ALVIN SELLMAN

Attorney for Plaintiff

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